

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: J.M. Nagda et al. Examiner: Ali, M. #18
Serial No.: 09/388,261 Group Art Unit: 2177
Filed: August 31, 1999 Docket No.: BO999027
TITLE: A WORKFLOW MANAGEMENT SYSTEM FOR GENERATING OUTPUT
MATERIAL BASED ON CUSTOMER INPUT

CERTIFICATE UNDER 37 CFR 1.8:

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Assistant Commissioner of Patents, Washington, D.C. 20231 on January 31, 2003.

David W. Victor

TRANSMITTAL OF NEW APPEAL BRIEF IN
RESPONSE TO NOTIFICATION OF NON-COMPLIANCE

Assistant Commissioner for Patents
Washington, D.C. 20231

Dear Sir:

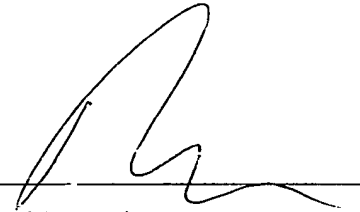
On January 15, 2003, a Notification of Non-Compliance with 37 CFR 1.192 was entered in the above case on the grounds that Applicants grouping of the claims in the filed Appeal Brief was vague and did not comply with 37 CFR 1.192(c)(7). On January 30, 2003, attorney for Applicants held a phone interview with Examiner John Breene to discuss the Notification. Examiner Breene suggested certain changes to the description of the grouping of the claims in the Appeal Brief that would comply with 37 CFR 1.192(c). In response, Applicants submit a new Appeal Brief herewith (in triplicate) with the changes to the description of the grouping of the claims suggested by the Examiner. Applicants submit that with these changes, the new Appeal Brief submitted herewith complies with 37 CFR 1.192(c), and thus should be entered and considered on the merits.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner has any further questions or comments on this matter.

Applicant submits that no fee is due with this transmittal. If incorrect, please charge any insufficiency to Deposit Account No. 50-0585. A duplicate of this letter is enclosed for fee processing.

Dated: January 31, 2003

By: _____


David W. Victor
Reg. No.: 39,867

Please direct all correspondences to:
David Victor
Konrad Raynes Victor & Mann, LLP
315 South Beverly Drive, Ste. 210
Beverly Hills, CA 90212
Tel: 310-553-7977
Fax: 310-556-7984

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BOARD OF PATENT APPEALS AND INTERFERENCES

APPEAL BRIEF

In re the Application of:

Jagdish M. Nagda et al.
Serial No. 09/388,261
Filed: August 31, 1999
Attorney Docket No. BO999027

A WORKFLOW MANAGEMENT SYSTEM FOR GENERATING
OUTPUT MATERIAL BASED ON CUSTOMER INPUT

Submitted by:

Konrad, Raynes Victor & Mann LLP
315 So. Beverly Dr., Ste. 210
Beverly Hills CA 90212
(310) 556-7983
(310) 556-7984 (fax)

TABLE OF CONTENTS

I.	REAL PARTY IN INTEREST	1
II.	RELATED APPEALS AND INTERFERENCES	1
III.	STATUS OF THE CLAIMS	1
IV.	STATUS OF AMENDMENTS	1
V.	SUMMARY OF THE INVENTION	1
VI.	ISSUES	3
VIII.	ARGUMENT: THE REJECTION OF CLAIMS 1-32 AS OBVIOUS OVER DEDRICK AND TACKBARY SHOULD BE REVERSED	4
	A. Issue: The Rejection of the Claims in Group I (Claims 1, 2, 4-7, 11, 12, 13, 15-18, 22, 23, 25-28) as Obvious in View of Dedrick and Tackbary Should Be Reversed	4
	B. Issue: The Rejection of the Claims in Group II (Claims 3, 14, and 24) as Obvious in View of Dedrick and Tackbary Should Be Reversed	9
	C. Issue: The Rejection of the Claims in Group III (Claims 8, 19, and 29) as Obvious in View of Dedrick and Tackbary Should Be Reversed	10
	D. Issue: The Rejection of the Claims in Group IV (Claims 9, 20, and 30) as Obvious in View of Dedrick and Tackbary Should Be Reversed	13
	E. Issue: The Rejection of the Claims in Group V (Claims 10, 21, and 31) as Obvious in View of Dedrick and Tackbary Should Be Reversed	14
IX.	CONCLUSION	15
	APPENDIX	16

I. REAL PARTY IN INTEREST

The entire right, title and interest in this patent application is assigned to real party in interest International Business Machines Corporation.

II. RELATED APPEALS AND INTERFERENCES

Appellant is not aware of any other appeals or interferences which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

III. STATUS OF THE CLAIMS

Claims 1-32 are pending.

The final rejection of the claims 1-32 is being appealed.

No claims have been canceled.

IV. STATUS OF AMENDMENTS

A Final Office Action was entered on March 18, 2002 in which the Examiner rejected all of the pending claims 1-32 as obvious (35 U.S.C. §103) in view of cited prior art. On September 11, 2002, an Advisory Action was entered in response to Applicants Response to Final Office Action dated June 18, 2002. In the Advisory Action, the Examiner rejected Applicants grounds of distinction over the prior art and maintained the rejection of all pending claims.

V. SUMMARY OF THE INVENTION

The present invention, in one aspect is directed to a method, system, and program for automated creation and delivery method for generating output material. A customer record is

generated in a first database table to include fields specifying at least one product, customer preferences, and a selected output method to deliver generated output material on the product specified in the customer record. At least one customer record in the first database table is received to process. At least one content file is accessed by querying a second database table using values in one received customer record. The content of each accessed file is generated into the output material. A determination is made of a selected one of a plurality of delivery options from the customer record and the output material is transmitted via the determined delivery option to the customer specified in the customer record.

In the illustrated embodiments of the present application, a customer record is shown in FIGs. 2a and 2b and on page 6, line 15 to page 7, line 18 is generated. The claimed steps of receiving one customer record, accessing at least one content file by querying a second database table, generating the content into the output material, determining a selected one of the delivery options, and transmitting the output material via the determined deliver operation are shown in at least FIGs. 5a and 5b and on page 12, line 13 to page 14, line 17 of the Application.

In one embodiment, generating the customer records comprises executing a mining program against a database including customer information to determine information to populate at least one customer record from the customer. This claim requirement is shown in the Application at page 7, lines 19-21.

In a further embodiment, a template including queries of records in the second database table is processed. In such case, accessing at least one file using values in one received customer record further comprises accessing at least one value in a field in one customer record to include in a query against the second database table and applying the query against the second database table to determine a record associated with a file including fields matching the query. The

accessed file is associated with the determined record. Generating the content into the output material comprises generating the content into the template, which forms the output material. These claim requirements are shown in the Application at FIG. 4 and pages 9, line 3 to page 12, line 12.

In a further embodiment, there are multiple files for each query, wherein the records associated with the files for each query have different values in at least one field, and wherein determining the record comprises determining the record from the files associated with the query that matches the search criteria. These claim requirements are shown in the Application at page 7, line 19 to page 9, line 2.

In a further embodiment, each query is maintained in a container in the template, wherein the file having the associated record that matches the query is generated into the container. The appearance of the file content generated into the containers is resized in the output material. These claim requirements are shown in the Application at FIG. 4 and pages 9, line 3 to page 12, line 12.

VI. ISSUES

A concise statement of the issues presented for review is as follows:

Whether the Examiner is correct in rejecting claims 1-32 under 35 U.S.C. §103 as obvious over Dedrick (U.S. Patent No. 5,717,923) and Tackbary (U.S. Patent No. 5,555,496).

VII. GROUPING OF THE CLAIMS

Pursuant to 37 CFR 1.192(c)(7), Applicants submit that the claims do not stand or fall together and that the following Five Groups of claims subject to the same rejection are separately patentable:

Group I: Claims 1, 2, 4-7, 11, 12, 13, 15-18, 22, 23, 25-28, and 32

Group II: Claims 3, 14, and 24

Group III: Claims 8, 19, and 29

Group IV: Claims 9, 20, and 30

Group V: Claims 10, 21, and 31

VIII. ARGUMENT: THE REJECTION OF CLAIMS 1-32 AS OBVIOUS OVER DEDRICK AND TACKBARY SHOULD BE REVERSED

A. Issue: The Rejection of the Claims in Group I (Claims 1, 2, 4-7, 11, 12, 13, 15-18, 22, 23, 25-28) as Obvious in View of Dedrick and Tackbary Should Be Reversed

In the Final Office Action, the Examiner cited col. 16, lines 23-32, col. 4, lines 11-23, and col. 14, lines 60-64 of Dedrick as teaching the claim requirement of independent claims 1, 12, and 22 of accessing at least one content file by querying a second database. (Final Office Action, pg. 2) This claim limitation requires accessing at least one content file by querying a second database table using values received in one customer record in a first database table, and then generating the content of each accessed file in the received output material. A review reveals that the cited Dedrick nowhere teaches or suggests this claim requirement. The Examiner did not cite Tackbary for this claim requirement

The cited col. 16 of Dedrick, which references FIGs. 7a and 7b, discusses how in response to a user request for advertising information at block 214, a metering server transfers the advertisement the user and records profile data of the user who requested the advertisement. Dedrick further mentions that this customer profile information is compiled and the advertisers account debited, so that the advertiser receives a bill for the access and the profile data of the end user that accessed the site.

Nowhere does this cited col. 16 of Dedrick anywhere teach or suggest the specific claim requirement of accessing at least one content file by querying a second database table using values from a customer record. In fact, this cited col. 16 of Dedrick teaches away from the claim requirement because in the cited Dedrick the content or advertisement is sent to the user before the user profile information is accessed. Thus, the cited Dedrick teaches away from using the customer information values to generate the content to provide the user because in Dedrick, the user profile information is not used to access a content file and generate the output material as claimed. The user profile information in the cited Dedrick is only recorded to keep track of which users were requesting advertisements. In the cited Dedrick, the user profile information is not accessed to use profile values to query a second database table to access at least one content file to generate as output material as claimed.

The cited col. 4, lines 11-23 of Dedrick discusses tools to allow an advertiser to create electronic information including content and advertisements. This electronic information may allow an end user to access a content database. Although this cited Dedrick does mention accessing a content database, nowhere does this cited section anywhere suggest or remotely mention the claim requirement of accessing a content file by querying a second database with

values in one received customer record and generating the content of each accessed file into the output material.

The cited col. 14, lines 60-64 of Dedrick mentions that an interactive process may allow an end user to answer queries and take paths to external data, and to initiate a query with the advertiser requesting follow-up information. Although this cited section discusses using queries to access data, nowhere does this cited section anywhere suggest or remotely mention the claim requirement of accessing a content file by querying a second database table with values in one received customer record in a first database table, and then generating the content as output to send to the user.

Moreover, the cited col. 14 of Dedrick teaches away from the claim requirements because the cited Dedrick discusses how a user generates the queries. The claims, on the other hand, require that an automated creation and delivery process access a content file by querying a second database using the values from the customer record. Thus, the cited col. 14 does not suggest that an automatic process use a query including a value from a customer record to access a content file. Instead, the cited col. 14 of Dedrick only mentions a user initiating a query to obtain follow-up information.

For the above reasons, the cited Dedrick does not teach or suggest the claim requirements for which it was cited. Further, the Examiner did not cite Tackbary for teaching or suggesting the claim requirements concerning accessing the content file by querying a second database using values in a received customer record, and then generating the content of the accessed file into the output material. Thus, neither the cited Dedrick nor the cited Tackbary, alone or in combination, anywhere teach or suggest the claim requirements concerning accessing the content file and generating the content into output material.

The Examiner cited col. 9, lines 7-15, FIG. 5, and the Abstract of Tackbary for the claim requirement of transmitting the output material via a selected delivery option. The cited col. 9, lines 7-15 discusses a mail mode box to allow a user to electronically select a method by which a the card is sent. The cited FIG. 5 shows a card dialog box in which the user can view information about the status of a card event and recipient.

Although the cited Tackbary discusses electronically storing information to include in a greeting-type card, the independent claims 1, 12, and 22 require that the delivery options are stored in a customer record whose values are used to query a second database to determine the content to generate into the output material. Nowhere does the cited Tackbary nor Dedrick teach the combination claim requirement of storing the delivery option in a customer record whose values are used to query a database to access the content for the output material. The Examiner does not cite any art that suggests such a claimed combination and, thus, is proposing modifications to the cited prior art that are nowhere taught or suggested in the cited art.

Applicants submit that the case law is very clear that a claimed combination is not obvious just because one can readily modify the prior art to produce the claimed combination, unless the Examiner can provide some objective reference teaching or suggesting the claimed combination. According to the U.S. Court of Appeals for the Federal Circuit ("Federal Circuit"), "[t]he mere fact that the prior art could be so modified would not have made the modification obvious unless the prior art suggested the desirability of the modification." In re Gordon, 221 USPQ 1125, 1127 (Fed. Cir. 1984) In Gordon, the mere fact that the prior art device could have been turned upside down to produce the claimed device was not sufficient to render the claimed combination obvious. Here, as in Gordon, the Examiner is proposing modifications to the cited references that are nowhere taught or suggested in the cited art.

Even modifications that may appear simple cannot be made unless the Examiner provides suggestion or motivation to make the apparent "simple" modification. According to the Federal Circuit,

In a proper obviousness determination, "[w]hether the changes from the prior art are 'minor', . . . the changes must be evaluated in terms of the whole invention, including whether the prior art provides any teaching or suggestion to one of ordinary skill in the art to make the changes that would produce the patentee's . . . device." *Northern Telecom, Inc. v. Datapoint Corp.*, 908 F.2d 931, 935, 15 USPQ2d 1321, 1324 (Fed. Cir.), cert. denied, 498 U.S. 920 (1990). This includes what could be characterized as simple changes, as in *In re Gordon*, 733 F.2d 900, 902, 221 USPQ 1125, 1127 (Fed. Cir. 1984) (Although a prior art device could have been turned upside down, that did not make the modification obvious unless the prior art fairly suggested the desirability of turning the device upside down.).

In re Chu, 36 USPQ2d 1089, 1094 (Fed. Cir. 1995) (emphasis added)

Here, the Examiner has not offered any objective evidence of a suggestion or motivation in the art for the claim requirements of accessing a content file by querying a second database table using values in one received customer record and transmitting the output material via a delivery option indicated in the customer record.

Accordingly, Applicants request the Board to reverse the Examiner's decision with respect to claims 1, 12, and 22 because the Examiner has not cited any art that teaches or suggests the claim requirements discussed above.

Applicants further request the Board to reverse the Examiner's decision with respect to claims 2-11, 13-21, and 23-32 in Group I because these claims depend from claims 1, 12, and 22, which are patentable over the cited art for the reasons discussed above.

B. Issue: The Rejection of the Claims in Group II (Claims 3, 14, and 24) as Obvious in View of Dedrick and Tackbary Should Be Reversed

Claims 3, 14, and 24 in Group II are patentable over the cited art because they depend from claims 1, 12, and 22, which are patentable over the cited art for the reasons discussed above. Moreover, the claims in Group II are separately patentable over the cited art for the reasons discussed below.

Claims 3, 14, and 24 depend from claims 1, 12, and 22 and further require that generating the customer records comprises executing a mining program against a database including customer information to determine information to populate at least one customer record from the customer. The Examiner cited col. 1, line 37 to col. 2, line 15 as teaching the additional requirements of claims 3, 14, and 24 of Dedrick. (Final Office Action, pg. 5) Applicants traverse and submit that these claims are separately patentable over the cited art for the following reasons.

The cited col. 1, line 37 to col. 2, line 15 of Dedrick discuss how electronic information providers desire large amounts of information about their markets, such as demographic characteristics of consumers. The cited section further discusses customizing electronic information to individuals based on there previous actions. The cited col. 2 discusses a personal profile database storing consumer information. A content adaptor compares electronic info received by the client system to consumer information in the personal profile database and customize the electronic info to the individual based on the comparison.

Nowhere do the cited cols. 1 and 2 anywhere suggest how to get customer information to add to a customer record as claimed, which is stored in the first database. Instead, the cited

Dedrick discusses how to process customer information to return to the customer/user, not to populate a customer record stored in a database as claimed.

According, Applicants submit that claims 3, 14, and 24 provide separate grounds of patentability over the cited art because the cited art does not teach or suggest the additional requirements of these claims.

C. Issue: The Rejection of the Claims in Group III (Claims 8, 19, and 29) as Obvious in View of Dedrick and Tackbary Should Be Reversed

Claims 8, 19, and 29 in Group III are patentable over the cited art because they depend from claims 1, 12, and 22, which are patentable over the cited art for the reasons discussed above. Moreover, the claims in Group III are separately patentable over the cited art for the reasons discussed below.

Claims 8, 19, and 29 depend from claims 1, 12, and 22 and further require processing a template including queries of records in the second database table. These claims require that accessing at least one file using values in one received customer record comprises accessing at least one value in a field in one customer record to include in a query against the second database table and applying the query against the second database to determine a record associated with a file including fields matching the query. The accessed file is associated with the determined record. In such case, generating the content into the output material comprises generating the content into the template, which forms the output material.

The Examiner cited col. 1, line 37 to col. 2, line 15 and col. 14, lines 55-64 Dedrick as teaching the additional requirements of claims 8, 19, and 29. (Final Office Action, pg. 5)

Applicants traverse and submit that these claims are separately patentable over the cited art for the following reasons.

A review reveals that the cited Dedrick nowhere teaches or suggests the additional requirements of claims 8, 19, and 29 that a template include queries of records in the second database table, and that a file is accessed using values in one customer record from the first database table by applying the query having the value from the customer record against the second table to determine a record associated with a file, such that the accessed file generated into the content is associated with the determined record.

The cited cols. 1 and 2 of Dedrick discuss how electronic information providers desire large amounts of information about their markets, such as demographic characteristics of consumers. The cited section further discusses customizing electronic information to individuals based on their previous actions. The cited col. 2 discusses a personal profile database storing consumer information. A content adaptor compares electronic info received by the client system to consumer information in the personal profile database and customizes the electronic information to the individual based on the comparison.

Although, the cited cols. 1 and 2 discuss customizing information to an end user based on information in a personal profile database, nowhere do these cited cols. 1 and 2 anywhere teach or suggest a template that includes queries of records in the second database table, and that a query including values from the customer record is applied against the second database table to determine a record that is associated with the accessed file. Further, nowhere do the cited cols. 1 and 2 anywhere suggest that the content from the file is generated into the template, which also included the queries, to form the output material.

The cited col. 14, lines 55-64 discusses how an end user may search and view ads from a library of ads, answer queries, take alternative paths to an external database, and initiate a query with the advertiser requesting follow-up information. Nowhere does this cited section anywhere teach or remotely suggest the additional claim requirements of claims 8, 19 and 29 of a template including queries of records and then applying the query, including values from a customer record, to determine a record from the second database table associated with the content file to generate into the template to form the output material.

With respect to claims 8, 19, and 29, the Examiner further took Official notice that “processing a template is well known in the art” and that “it would have been obvious ... to process a template in order to be record[sic] in the database.” (Final Office Action, pg. 5) Applicants traverse this finding.

Although processing a template may be well known in the art, the claims require that the template include queries of records in a second database table and further require that the query in the template is applied using values in a customer record to determine a record that is associated with a content file. Nowhere does the Examiner’s Official Notice nor any cited art teach or suggest this particular claim combination. Further, the Examiner has not provided any teaching or motivation to modify the cited art to teach or suggest the combination of claims 8, 19, and 29.

Accordingly, Applicants submit that claims 8, 19, and 29 provide separate grounds of patentability over the cited art because the cited art does not teach or suggest the additional requirements of these claims.

D. Issue: The Rejection of the Claims in Group IV (Claims 9, 20, and 30) as Obvious in View of Dedrick and Tackbary Should Be Reversed

Claims 9, 20, and 30 in Group IV are patentable over the cited art because they depend from claims 1, 12, and 22, which are patentable over the cited art for the reasons discussed above. Moreover, the claims in Group IV are separately patentable over the cited art for the reasons discussed below.

Claims 9, 20, and 30 depend from claims 8, 19, and 29 and further require that there are multiple files for each query, wherein the records associated with the files for each query have different values in at least one field, and wherein determining the record comprises determining the record from the files associated with the query that matches the search criteria.

The Examiner cited col. 16, lines 27-30, col. 14, lines 55-64, and col. 1, line 37 to col. 2, line 15 of Dedrick as teaching the additional requirements of claims 9, 20, and 30. (Final Office Action, pgs. 5-6) Applicants traverse and submit that these claims are separately patentable over the cited art for the following reasons.

The cited col. 16 of Dedrick discusses how a metering server transfers an advertisement to the end user, credits an account and records profile data to provide to the advertiser. The cited col. 14 discusses how a user may initiate a request or queries to obtain information from an advertiser or external databases. As discussed, the cited cols. 1 and 2 mention customizing information for a user based on previous actions and maintaining a personal profile database for the user.

Nowhere in any of these cited sections of Dedrick is there any teaching or suggestion of multiple content files for each query, wherein the records associated with the files have different values, such that one of the records whose values match the query is determined .

Accordingly, Applicants submit that claims 9, 20, and 30 provide separate grounds of patentability over the cited art because the cited art, alone or in combination, does not teach or suggest the additional requirements of these claims.

E. Issue: The Rejection of the Claims in Group V (Claims 10, 21, and 31) as Obvious in View of Dedrick and Tackbary Should Be Reversed

Claims 10, 21, and 31 in Group V are patentable over the cited art because they depend from claims 1, 12, and 22, which are patentable over the cited art for the reasons discussed above. Moreover, the claims in Group V are separately patentable over the cited art for the reasons discussed below.

Claims 10, 21, and 31 depend from claims 9, 20, and 30 and further require that each query is maintained in a container in the template, wherein the file having the associated record that matches the query is generated into the container, further comprising resizing the appearance of the file content generated into the containers in the output material.

The Examiner cited col. 14, lines 55-64 and cols. 1, lines 37 to col. 2, line 15 of Dedrick as teaching the additional requirement of these claims. (Final Office Action, pg. 6) Applicants traverse and submit that these claims are separately patentable over the cited art for the following reasons.

As previously discussed, the cited col. 14 discusses how a user may initiate a request or queries to obtain information from an advertiser or external databases. As discussed, the cited cols. 1 and 2 mention customizing information for a user based on previous actions and maintaining a personal profile database for the user.

Nowhere do the cited cols. 1, 2, and 14 of Dedrick anywhere teach or remotely suggest that a query is maintained in a container within the template and that the file having the associated record that matches the query is generated into the container. Nowhere does the cited Dedrick anywhere teach or suggest generating the content of a file produced as a result of the query into a container that also included the query. Moreover, nowhere does the cited Dedrick anywhere teach or suggest resizing the appearance of the file content generated into the containers into the output material.

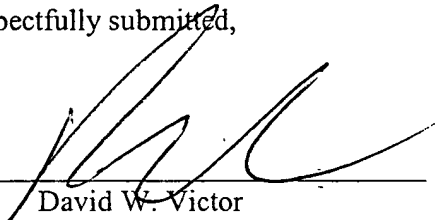
Accordingly, Applicants submit that claims 10, 21, and 31 provide separate grounds of patentability over the cited art because the cited art, alone or in combination, does not teach or suggest the additional requirements of these claims.

IX. CONCLUSION

The rejections of claims 1-32 in the Final Office Action is improper and should be reversed.

Respectfully submitted,

By: _____


David W. Victor
Reg. No.: 39,867

Dated: January 30, 2003

Please direct all correspondences to:

David Victor
Konrad Raynes Victor & Mann LLP
315 South Beverly Drive, Ste. 210
Beverly Hills, California 90212
Tel: 310-553-7977
Fax: 310-556-7984

X. APPENDIX

The claims on appeal are as follows:

1. A automated creation and delivery method for generating output material, comprising:
 - generating a customer record in a first database table to include fields specifying at least one product, customer preferences, and a selected output method to deliver generated output material on the product specified in the customer record;
 - receiving at least one customer record in the first database table to process;
 - accessing at least one content file by querying a second database table using values in one received customer record;
 - generating the content of each accessed file into the output material;
 - determining a selected one of a plurality of delivery options from the customer record;and
 - transmitting the output material via the determined delivery option to the customer specified in the customer record.
2. The method of claim 1, wherein the customer records in the first database table are generated by a human operator interacting with a customer to determine customer and preferences.
3. The method of claim 1, wherein generating the customer records comprises executing a mining program against a database including customer information to determine information to populate at least one customer record from the customer.
4. The method of claim one 1, wherein the delivery options are members of the set of delivery options consisting of: electronic mail, facsimile, and postal mail.
5. The method of claim 4, further comprising automatically transforming the output material to a format compatible with the selected delivery option, wherein a different format is used for each delivery option, wherein the transformed output is transmitted to the customer via the selected delivery option.

6. The method of claim 4, wherein multiple customer records are processed, and wherein the output generated from the customer records differs for at least two customers and the delivery option used to transmit the output differs for at least two customers.

7. The method of claim 4, wherein the output material is automatically transmitted using one of the selected delivery options after generating the output material and further automatically printed for subsequent postal mailing to a customer street address.

8. The method of claim 1, further comprising:
processing a template including queries of records in the second database table;
wherein accessing at least one file using values in one received customer record further comprises:

(i) accessing at least one value in a field in one customer record to include in a query against the second database table; and

(ii) applying the query against the second database table to determine a record associated with a file including fields matching the query, wherein the accessed file is associated with the determined record, and wherein generating the content into the output material comprises generating the content into the template, which forms the output material.

9. The method of claim 8, wherein there are multiple files for each query, wherein the records associated with the files for each query have different values in at least one field, wherein determining the record comprises determining the record from the files associated with the query that matches the search criteria.

10. The method of claim 9, wherein each query is maintained in a container in the template, wherein the file having the associated record that matches the query is generated into the container, further comprising resizing the appearance of the file content generated into the containers in the output material.

11. The method of claim 9, further comprising accessing data from the customer record to insert into the text generated into the container from the accessed file generated into the container.

12. An automated creation and delivery system for generating output material, comprising:

means for generating a customer record in a first database table to include fields specifying at least one product, customer preferences, and a selected output method to deliver generated output material on the product specified in the customer record;

means for receiving at least one customer record in the first database table to process;

means for accessing at least one content file by querying a second database table using values in one received customer record;

means for generating the content of each accessed file into the output material;

means for determining a selected one of a plurality of delivery options from the customer record; and

means for transmitting the output material via the determined delivery option to the customer specified in the customer record.

13. The system of claim 12, further comprising means for allowing a human operator to enter the data for the customer records in the first database table when interacting with a customer to determine customer preferences.

14. The system of claim 12, wherein the means for generating the customer records comprises executing a mining program against a database including customer information to determine information to populate at least one customer record from the customer.

15. The system of claim 12, wherein the delivery options are members of the set of delivery options consisting of: electronic mail, facsimile, and postal mail.

16. The system of claim 15, further comprising means for automatically transforming the output material to a format compatible with the selected delivery option, wherein a different format is used for each delivery option, wherein the transformed output is transmitted to the customer via the selected delivery option.

17. The system of claim 15, further comprising means to batch process multiple customer records, wherein the output generated from the customer records differs for at least two customers and the delivery option used to transmit the output differs for at least two customers.

18. The system of claim 15, further comprising:
means for automatically transmitting the output material using one of the selected delivery options after generating the output material; and
means for automatically printing the output material for subsequent postal mailing to a customer street address.

19. The system of claim 12, further comprising:
means for processing a template including queries of records in the second database table;
wherein the means for accessing at least one file using values in one received customer record further performs:

(i) accessing at least one value in a field in one customer record to include in a query against the second database table; and

(ii) applying the query against the second database table to determine a record associated with a file including fields matching the query, wherein the accessed file is associated with the determined record, and wherein the means for generating the content into the output material comprises generating the content into the template, which forms the output material.

20. The system of claim 19, wherein there are multiple files for each query, wherein the records associated with the files for each query have different values in at least one field, wherein the means for determining the record comprises determining the record from the files associated with the query that matches the search criteria.

21. The system of claim 20, wherein each query is maintained in a container in the template, wherein the file having the associated record that matches the query is generated into the container, further comprising means for resizing the appearance of the file content generated into the containers in the output material.

22. An article of manufacture for providing an automated creation and delivery system for generating output material, the article of manufacture comprising a computer usable media including at least one computer program embedded therein that is capable of causing at least one computer to perform:

generating a customer record in a first database table to include fields specifying at least one product, customer preferences, and a selected output method to deliver generated output material on the product specified in the customer record;

receiving at least one customer record in the first database table to process;

accessing at least one content file by querying a second database table using values in one received customer record;

generating the content of each accessed file into the output material;

determining a selected one of a plurality of delivery options from the customer record;

and

transmitting the output material via the determined delivery option to the customer specified in the customer record.

23. The article of manufacture of claim 22, wherein the customer records in the first database table are generated by a human operator interacting with a customer to determine customer and preferences.

24. The article of manufacture of claim 22, wherein generating the customer records comprises executing a mining program against a database including customer information to determine information to populate at least one customer record from the customer.

25. The article of manufacture of claim 22, wherein the delivery options are members of the set of delivery options consisting of: electronic mail, facsimile, and postal mail.

26. The article of manufacture of claim 25, further comprising automatically transforming the output material to a format compatible with the selected delivery option, wherein a different format is used for each delivery option, wherein the transformed output is transmitted to the customer via the selected delivery option.

27. The article of manufacture of claim 25, wherein multiple customer records are processed, and wherein the output generated from the customer records differs for at least two customers and the delivery option used to transmit the output differs for at least two customers.

28. The article of manufacture of claim 25, wherein the output material is automatically transmitted using one of the selected delivery options after generating the output material and further automatically printed for subsequent postal mailing to a customer street address.

29. The article of manufacture of claim 22, further comprising:
processing a template including queries of records in the second database table;
wherein accessing at least one file using values in one received customer record further comprises:

(i) accessing at least one value in a field in one customer record to include in a query against the second database table; and

(ii) applying the query against the second database table to determine a record associated with a file including fields matching the query, wherein the accessed file is associated with the determined record, and wherein generating the content into the output material comprises generating the content into the template, which forms the output material.

30. The article of manufacture of claim 29, wherein there are multiple files for each query, wherein the records associated with the files for each query have different values in at least one field, wherein determining the record comprises determining the record from the files associated with the query that matches the search criteria.

31. The article of manufacture of claim 30, wherein each query is maintained in a container in the template, wherein the file having the associated record that matches the query is generated into the container, further comprising resizing the appearance of the file content generated into the containers in the output material.

32. The article of manufacture of claim 30, further comprising accessing data from the customer record to insert into the text generated into the container from the accessed file generated into the container.

S.N. 09/388,261 Docket No. BO999027 Date Mailed 1/31/03 By: DWV/vsj

Title: A WORKFLOW MANAGEMENT SYSTEM FOR GENERATING OUTPUT
MATERIAL BASED ON CUSTOMER INPUT

Client: International Business Machines Corporation 0036.0042

Receipt is hereby acknowledged for the following received in the Patent & Trademark Office
on the date stamped hereon:

☒ Transmittal of New Appeal Brief in Response to Notification of Non-
Compliance

☒ Return Postcard

E 3 COPIES OF APPEAL BRIEF